

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

V.

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED STATES SECRETARY OF
STATE ANTONY BLINKEN, *et al.*,

Nominal Defendants.


Case No. 3:22-cv-00049-NKM

JOINT STIPULATION AND ORDER REGARDING PARTICIPATION IN DISCOVERY

Plaintiffs and Defendant Kimberley Motley jointly stipulate as follows: Motley preserves all Rule 12 and other defenses in this case, as may be applicable, including but not limited to Rule 12(b)(2) defenses for lack of personal jurisdiction. Motley may participate in discovery while her motion to dismiss for lack of personal jurisdiction is pending, including by responding to Plaintiffs' discovery requests and by serving her own requests, without waiving any right or defense. Motley's participation in any such discovery will not constitute a waiver of her rights or defenses in this litigation, including her right to contest personal jurisdiction.

SO ORDERED.

Date: May 16, 2023


The Honorable Norman K. Moon
U.S. District Judge for the Western District of Virginia

Submitted: May 4, 2023.

/s/ Kevin S. Elliker

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